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6		NETRICT COLURT	
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
8	UNITED STATES OF AMERICA,	Case No. 2:20-mj-00282-VCF	
9	Plaintiff,	Stipulation for an Order Directing Probation to Prepare a Criminal	
10	v.	History Report	
11	CESAR FONTANELLI-ROJAS,		
12	Defendant.		
13			
14		A CREED 1 11 1 1 1 1 1	
15	IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.		
16	Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States		
17	Attorney, counsel for the United States of America, and Nisha Brooks-Whittington,		
18	Assistant Federal Public Defender, counsel for Defendant Cesar Fontanelli-Rojas, that the		
19	Court direct the United States Probation Office to prepare a report detailing the defendant's		
20	criminal history.		
21	This stipulation is entered into for the following reasons:		
22	1. The defendant has elected to review the government's Fast Track offer to		
23	resolve this matter. If he accepts this offer, the	parties will jointly request a change of plea	
24			

1	and sentencing hearing date 45 days from the defendant's execution of the proposed plea	
2	agreement.	
3	2. The United States Probation Office cannot begin obtaining the defendant's	
4	criminal history until after the defendant enters his guilty plea unless the Court enters an	
5	order directing the United States Probation Office to do so. Such an order is often entered	
6	in the minutes of a defendant's initial appearance.	
7	3. The United States Probation Office informs the government that it would	
8	like to begin obtaining the defendant's criminal history now so that it can complete the	
9	Presentence Investigation Report by the time of the expected change of plea and sentencing	
10	hearings.	
11	Accordingly, the parties request that the Court enter an order directing the United	
12	States Probation Office to prepare a report detailing the defendant's criminal history.	
13	DATED this 21th day of April, 2020.	
14		Respectfully submitted,
15		NICHOLAS A. TRUTANICH United States Attorney
16	//s//	//s//
17	NISHA BROOKS-WHITTINGTON Assistant Federal Public Defender Counsel for Defendant CESAR FONTANELLI-ROJAS	KIMBERLY M. FRAYN Assistant United States Attorney
18		715515tant Office States 7ttorney
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UNITED STATES DISTRICT COURT

1 **DISTRICT OF NEVADA** 2 3 UNITED STATES OF AMERICA, Case No. 2:20-mj-282-VCF **Order Directing Probation to Prepare** 4 Plaintiff, a Criminal History Report 5 v. CESAR FONTANELLI-ROJAS, 6 7 Defendant. 8 9 10 Based on the stipulation of counsel, good cause appearing, and the best interest of 11 justice being served: 12 IT IS HEREBY ORDERED that the United States Probation Office is directed to 13 prepare a report detailing the defendant's criminal history. 14 DATED this 21st day of April, 2020. 15 16 HONORABLE CAM FERENBACH 17 UNITED STATES MAGISTRATE JUDGE 18 19 20 21 22 23

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